

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

**SAMUEL ORTEGA, and
REBECCA SCOTT,**

Plaintiffs,

vs.

No. 1:24-cv-00471-JB-SCY

**MICHELLE LUJAN GRISHAM, in her
official capacity as Governor of the State of
New Mexico, and RAÚL TORREZ, in his
official capacity as Attorney General of the
State of New Mexico,**

Defendants.

GOVERNOR LUJAN GRISHAM'S NOTICE OF SUPPLEMENTAL AUTHORITY

Governor Michelle Lujan Grisham hereby files the attached Expert Reports and Declarations of Professors Christopher Poliquin and Eric Ruben filed in *Richards v. Bonta*, No. 3:23-cv-00793-LAB-AHG, (S.D. Cal., Sep. 21, 2023), to supplement the Court on pertinent and significant authorities central to the issues of this case pursuant to D.N.M.LR-Civ 7.8. *See Hernandez v. Lujan Grisham*, 494 F. Supp. 3d 1044, 1067 n.2 (D.N.M. 2020) (Browning, J.) (finding declarations filed in another court “persuasive”).

Professor Ruben explains how American society’s treatment of suicide evolved since the founding and how gun-related suicides did not emerge as a widespread issue until relatively recently, which demonstrates that the challenged waiting period satisfies the history and tradition test established in *New York State Rifle & Pistol Ass’n, Inc. v. Bruen*, 597 U.S. 1 (2022). *See* [Doc. 15 at 14-15]. Professor Poliquin explains the beneficial impact of firearm purchase waiting periods on firearm deaths, which is relevant to the Court’s consideration of the balance of the equities and

public interest elements required for a preliminary injunction under *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7 (2008). *See* [Doc. 15 at 19-20].

Respectfully submitted,

/s/ Holly Agajanian

HOLLY AGAJANIAN

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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2024, I filed the foregoing via the CM/ECF filing system, which caused all counsel of record to be served by electronic means.

/s/ Holly Agajanian
Holly Agajanian